

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
VICTORIA DIVISION**

---

In re:	)	Case No. 22-60043
FREE SPEECH SYSTEMS, LLC,	)	Chapter 11 (Subchapter V)
Debtor.	)	

---

**WITNESS AND EXHIBIT LIST**

---

Judge:	Hon. Christopher M. Lopez
Hearing Date:	Monday, August 1, 2022
Hearing Time:	8:30 a.m. (CT)
Party's Name:	Free Speech Systems, LLC
Attorney's Name:	RJ Shannon, Kyung S. Lee
Attorney's Phone:	(713) 714-5770
Nature of Proceeding:	<p>Hearing on:</p> <ul style="list-style-type: none"> <li>Emergency Motion for an Order Modifying the Automatic Stay to Allow the Heslin/Lewis State Court Suit to Continue to Judgement [Docket No. 2] (the "<u>Stay Motion</u>").</li> </ul>

Shannon & Lee LLP ("S&L") proposed co-counsel to Free Speech Systems, LLC (the "Debtor"), in the above-captioned chapter 11 case (the "Chapter 11 Case"), hereby submits this witness and exhibit list in connection with the hearing to be held on Monday, August 1, 2022, at 8:30 a.m. (Central Time) (the "Hearing") on the Stay Motion.

**WITNESSES**

The Debtor may call any of the following witnesses at the Hearing, whether in person or by proffer:

1. W. Marc Schwartz, Chief Restructuring Officer of Free Speech Systems, LLC;
2. Any witnesses necessary to establish notice of the Hearing has been provided; and
3. Any witnesses necessary to rebut the testimony of any witnesses called or designated by any other parties.

**EXHIBITS**

The Debtor may offer for admission into evidence any of the following exhibits at the Hearing:

Ex.	Description	Offered	Objection	Admitted /Not Admitted	Disposition
1	Debtor's Emergency Motion for Order Modifying the Automatic Stay to Allow the Heslin[s]/Lewis State Court to Continue to Judgement [ECF No. 2].				
2	Declaration of W. Marc Schwartz in Support of Voluntary Petition and First Day Motions [ECF No. 10].				
3	CV of W. Marc Schwartz, CPA/CFF, CFE.				
4	Engagement Letter of Schwartz Associates, LLC.				
5	Plaintiffs' Fourth Amended Petition, D-1-GN-18-001835, District Court of Travis County, Texas 261 <sup>st</sup> District Court.				
6	Plaintiffs' Exhibit List.				
7	Plaintiffs' Witness List.				
8	Defendants Exhibit List.				
9	Defendants Witness List.				

The Debtor reserves the right to supplement, amend or delete any witness and exhibits prior to the hearing. The Debtor also reserves the right to use any exhibits presented by any other party and to ask the Court to take judicial notice of any document. The Debtor finally reserves the right to introduce exhibits previously admitted.

Respectfully submitted the 31<sup>st</sup> day of July, 2022.

LAW OFFICES OF RAY BATTAGLIA, PLLC

Raymond W. Battaglia  
State Bar No. 01918055  
[rbattaglialaw@outlook.com](mailto:rbattaglialaw@outlook.com)  
66 Granburg Circle  
San Antonio, Texas 78218  
Tel. (210) 601-9405

*Proposed Counsel to the Debtor and Debtor-In-Possession*

-and-

SHANNON & LEE LLP

/s/ R. J. Shannon  
Kyung S. Lee  
State Bar No. 12128400  
[klee@shannonleellp.com](mailto:klee@shannonleellp.com)  
R. J. Shannon  
State Bar No. 24108062  
[rshannon@shannonleellp.com](mailto:rshannon@shannonleellp.com)  
700 Milam Street, STE 1300  
Houston, Texas 77002  
Tel. (713) 714-5770

*Proposed Co-Counsel to the Debtor and Debtor in Possession*